

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI

ALEXANDRA GILHAM, )  
                        )  
Plaintiff,           )                      Case No. 20-622  
vs.                    )  
                        )  
STATE FARM MUTUAL )  
AUTOMOBILE INSURANCE )  
COMPANY,             )  
                        )  
Defendant.           )

**NOTICE OF REMOVAL**

The Petitioner, State Farm Mutual Automobile Insurance Company (“State Farm”), defendant herein, respectfully states to the Court:

1. That there was commenced and is now pending in the Circuit Court of Clay County, Missouri, a civil action in which Alexandra Gilham is the Plaintiff, State Farm Mutual Automobile Insurance Company is the Defendant, said case captioned Alexandra Gilham, Plaintiff, v. State Farm Mutual Automobile Insurance Company, Defendant, Case No. 20CY-CV05519.

2. That said action is a civil suit, of which this Court has original jurisdiction under the provisions of Title 28, U.S. Code, Section 1332, as amended, and is one which may be removed to this Court by Defendant, State Farm Mutual Automobile Insurance Company, pursuant to the provisions of Title 28, U.S. Code, Section 1441, in that it is a civil action wherein the matter in controversy exceeds the sum or value of Seventy-Five Thousand and no/100 Dollars (\$75,000.00), exclusive of interest and costs, and is between citizens of different states.

3. That the Petitioner shows that said cause of action involved a controversy between citizens of different states, to-wit:

- a. The plaintiff Alexandra Gilham is now, and was at the commencement of this action, citizen and resident of the State of Missouri.
  - b. The defendant State Farm Mutual Automobile Insurance Company is an Illinois corporation with its principal place of business in Illinois.
4. That on July 6, 2020, Plaintiff filed her Petition naming State Farm as a defendant.
5. That Defendant was served on July 15, 2020 and this Notice is therefore filed within thirty (30) days after receipt by this Defendant of a filed copy of the Plaintiff's Petition.
6. That there is filed herewith as Exhibit A, and by reference made a part hereof, a true and correct copy of all process, pleadings and orders received by Defendant in reference to the above-captioned matter in the Circuit Court of Clay County, Missouri.

WHEREFORE, Petitioner prays that further proceedings in the Circuit Court of Clay County, Missouri, be discontinued, and that this action be removed to the United States District Court for the Western District of Missouri.

/s/ Mimi E. Doherty  
Mimi E. Doherty, #35091  
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ATTORNEYS FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that on August 6, 2020, I electronically filed the foregoing with the Clerk of Court which sent electronic filing to the following:

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/s/ Mimi E. Doherty  
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Attorney For Defendant